



COHEN & GRESSER LLP

800 Third Avenue  
New York, NY 10022  
+1 212 957 7600 phone  
www.cohengresser.com

Mark S. Cohen  
+1 (212) 957-7600  
mcohen@cohengresser.com

Christian R. Everdell  
+1 (212) 957-7600  
ceverdell@cohengresser.com

February 24, 2023

**VIA ECF**

The Honorable Lewis A. Kaplan  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Samuel Bankman-Fried*, 22 Cr. 673 (LAK)**

Dear Judge Kaplan:

On behalf of our client, Samuel Bankman-Fried, we respectfully submit this letter to advise the Court about the status of finding an independent technical expert to advise the Court on technical issues concerning Mr. Bankman-Fried's bail conditions, and the status of the parties' discussions concerning new proposed bail conditions for Mr. Bankman-Fried. The parties have been diligently vetting candidates to serve as the Court's technical consultant but have not yet identified a suitable candidate. Similarly, the parties have been engaged in productive discussions about additional bail conditions for Mr. Bankman-Fried but would like more time to complete those discussions.

At the February 16, 2023 conference, the Court indicated that it would be amenable to giving the parties additional time to work through these issues. *See* Tr. 2/16/2023 Conf. at 28-29. For the reasons set forth above, we respectfully request that the Court grant the defense an extension of time to file our proposal for the Court's technical consultant and additional bail conditions until Friday, March 3, 2023. The Government has no objection to this request. The parties also have no objection to continuing Mr. Bankman-Fried's current bail conditions for whatever period the Court deems appropriate while these discussions are taking place.

Respectfully submitted,

/s/ Christian R. Everdell  
Mark S. Cohen  
Christian R. Everdell  
**COHEN & GRESSER LLP**  
800 Third Avenue, 21st Floor

The Honorable Lewis A. Kaplan  
February 24, 2023  
Page 2

New York, New York 10022  
(212) 957-7600  
mcohen@cohengresser.com  
ceverdell@cohengresser.com

cc: All counsel of record (via ECF)